

**EXHIBIT A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-11069 (CTG)  
(Jointly Administered)

Re: D.I. No. \_\_\_\_

**ORDER GRANTING CONSENT MOTION OF AFCO CREDIT CORPORATION FOR  
AN ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY PURSUANT  
TO 11 U.S.C. § 362(d) AND BANKRUPTCY RULE 4001(a)**

Upon consideration of the Motion<sup>2</sup> of AFCO Credit Corporation (“AFCO”) for the entry of an order, pursuant to section 362(d) of the Bankruptcy Code, terminating the automatic stay *nunc pro tunc* to September 1, 2023, as to the Second Finance Agreement, to permit AFCO to cancel certain insurance policies whose unearned insurance premiums (“Unearned Premiums”) secure loans that AFCO made to Yellow for payment of those insurance policies; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated February 29, 2012; and the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the parties listed therein, and it appearing that no other or further notice need be

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<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of Debtors’ principal place of business and the Debtors’ service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400, Overland Park, Kansas 66211.

<sup>2</sup> Capitalized terms not defined in this Order have the meanings ascribed to such terms in the Motion.

provided; and this Court having reviewed the Motion; and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after notice and an opportunity for a hearing pursuant to 11 U.S.C. § 102(1), and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT**:

1. The Motion is **GRANTED** as set forth herein.
2. Pursuant to section 362(d) of the Bankruptcy Code, the automatic stay of section 362(a) of the Bankruptcy Code shall be, and hereby is, modified *nunc pro tunc* to September 1, 2023 as to the Second Finance Agreement to permit AFCO to exercise its rights and remedies under applicable non-bankruptcy law in connection with the Second Finance Agreement and the policies financed thereunder, including (a) cancelling the Financed Policies under the Second Financing Agreement effective as of September 1, 2023; (b) recovering the Unearned Premiums; and (c) applying the Unearned Premiums to the indebtedness owed under the Second Finance Agreement.
3. Notwithstanding any provision in the Bankruptcy Code or the Federal Rules of Bankruptcy Procedure to the contrary: (a) this Order shall be effective and enforceable immediately upon its entry; (b) any stay imposed by Federal Rule of Bankruptcy Procedure 4001(a)(3) or otherwise, to the extent applicable, is hereby waived; and (c) AFCO is authorized and empowered, and may in its discretion and without further delay, take any and all action necessary or appropriate to implement the relief granted in this Order.
4. Nothing in this Order shall preclude AFCO from seeking payment, or the return of, additional amounts that it may determine are due pursuant to the terms of the First Finance Agreement.

5. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

Date: September \_\_\_\_, 2023  
Wilmington, Delaware

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**HON. CRAIG T. GOLDBLATT**  
**UNITED STATES BANKRUPTCY JUDGE**